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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ***

11 DANIEL SMALL, CAROLYN SMALL.
WILLIAM CURTIN, DAVID COHEN,
12 LANETTE LAWRENCE, and LOUISE
COLLARD, Individually, and on Behalf of All
13 Other Persons Similarly Situated,

14 Plaintiffs,

15 vs.

16 UNIVERSITY MEDICAL CENTER OF
SOUTHERN NEVADA; a political
17 subdivision of Clark County, State of Nevada,
CLARK COUNTY, a political subdivision of
18 the State of Nevada, and JOHN ESPINOZA,
an individual.

19 Defendants.
20

CASE NO. 2-13-cv-0298-APG - PAL

**STIPULATION AND [PROPOSED]
ORDER TO STAY AND PROPOSED
BRIEFING SCHEDULE**

21 IT IS HEREBY STIPULATED AND AGREED BETWEEN Plaintiffs DANIEL SMALL,
22 CAROLYN SMALL, WILLIAM CURTIN, DAVID COHEN, LANETTE LAWRENCE, and
23 LOUISE COLLARD, and Defendants UNIVERSITY MEDICAL CENTER OF SOUTHERN
24 NEVADA and JOHN ESPINOZA (collectively referred to as “the Parties”) by and through their
25 respective counsel, as follows:

26 On October 30, 2018, the Court granted the Parties’ Stipulation to Extend Briefing
27 Schedule regarding the Parties’ Responses to the pending Motions for Summary Judgment. (ECF
28

1 No. 346). Pursuant to such, the deadline to file Responses was extended to December 4, 2018.
2 (*Id.*)

3 On November 5, 2018, Magistrate Leen granted Plaintiffs' Revised Application for Costs
4 and Attorneys' Fees. (ECF No. 347). Pursuant to such, Magistrate Leen ordered UMC to pay
5 Plaintiffs' attorneys' fees and costs by December 5, 2018. (*Id.*) The deadline to file an Objection
6 to the Order granting Plaintiffs' Revised Application for Costs and Attorneys' Fees is November
7 19, 2018.

8 The Parties are engaged in settlement negotiations. To facilitate continued settlement
9 negotiations, the Parties hereby stipulate and agree that this matter be stayed for all purposes for
10 sixty (60) days.

11 The Parties further stipulate and agree that upon the expiration of sixty (60) days, the
12 Parties' shall have twenty-one (21) days to file Responses to the pending Motions for Summary
13 Judgment.

14 The Parties further stipulate and agree that UMC shall have until December 3, 2018, to file
15 an Objection to the Order granting Plaintiffs' Revised Application for Costs and Attorneys' Fees.
16 (ECF No. 347). Plaintiffs shall have fourteen (14) days upon the expiration of the sixty (60) day
17 stay to file a response to UMC's Objection to the Order granting Plaintiffs' Revised Application
18 for Costs and Attorneys' Fees.

19 Counsel for the Parties have met and conferred regarding an agreed stay; met and
20 conferred regarding an extension of the briefing schedule for the Parties' Responses; and, met and
21 conferred regarding an extension of the deadline to file an Objection to the Magistrate's Order
22 granting Plaintiffs' Revised Application for Costs and Attorneys' Fees.

23 THEREFORE, the Parties hereby respectfully stipulate and request:

- 24 1. That this matter be stayed sixty (60) days for all purposes.
- 25 2. That upon the expiration of sixty (60) days, the Parties' shall have twenty-one (21)
26 days to file Responses to the pending Motions for Summary Judgment.
- 27 3. That UMC shall have an extension to December 3, 2018, to file an Objection to the
28 Order granting Plaintiffs' Revised Application for Costs and Attorneys' Fees.

1 4. Plaintiffs shall have fourteen (14) days upon the expiration of sixty (60) day stay to
2 file a response to UMC's Objection to the Order granting Plaintiffs' Revised Application for Costs
3 and Attorneys' Fees.

4 IT IS SO STIPULATED.

5 DATED this 16th day of November, 2018.

DATED this 16th day of November, 2018.

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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE
Dated: November 20, 2018.